

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Ryan W. Montgomery and, : Bankruptcy Case No.: 20-21256-CMB
Amy L. Montgomery, :
Debtors. : Chapter 13
:
:
Ryan W. Montgomery and, :
Amy L. Montgomery, : Document No.: 208
Movants, : Related to Document No.:
v. : Related to Claim No.: 17
Huntington Bank, :
:
Respondent. :
:

DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Notice of Mortgage Payment Change filed on February 27, 2025, after reasonable investigation and upon review of the Amended Chapter 13 Plan, it appears to Debtor that the payment is sufficient to fund the Plan even with the proposed change for March 20, 2025.

The new post-petition monthly payment payable to Respondent is \$377.16, effective March 20, 2025, per the notice dated February 27, 2025. The Debtor's Amended Plan payment provides for a monthly payment to Huntington Bank of \$405.00. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: February 27, 2025

/s/Brian C. Thompson
Brian C. Thompson, Esquire
Attorney for Debtor
PA I.D. # 91197
Thompson Law Group, P.C.
301 Smith Drive, Suite 6
Cranberry Township, PA 16066
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com